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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Coalition for App Fairness *et al.*,

Petitioners,

vs.

Apple Inc.,

Defendant.

Case No. 4:21-mc-80194-YGR (TSH)

**STIPULATION AND [PROPOSED] ORDER
REGARDING WITHDRAWAL OF
PETITIONERS' MOTION TO QUASH AND
APPLE INC.'S MOTION TO COMPEL**

Pursuant to Civil Local Rule 7-12, Petitioners Coalition for App Fairness, Forbes Tate Partners LLC, and Meghan DiMuzio ("Petitioners") and Defendant Apple Inc. ("Apple"), by and through their respective counsel, hereby agree as follows:

WHEREAS, in light of the Settlement Agreement and related motion for preliminary approval filed in *Cameron v. Apple Inc.*, No. 4:19-cv-03074-YGR (TSH), Apple has elected to

1 withdraw the subpoenas it served on Petitioners and withdraw the motion to compel pending in this
2 action;

3 WHEREAS, Petitioners therefore agree to withdraw the motion to quash pending in this
4 action as moot;

5 WHEREAS, Apple reserves all rights to pursue additional documents in the future without
6 reservation;

7 WHEREAS, Petitioners similarly reserve all rights to object to such pursuit, including, but
8 not limited to, on grounds of relevance, privilege, and timeliness;

9 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that Apple
10 withdraws the subpoenas it served on Petitioners and withdraws the motion to compel pending in
11 this action and that Petitioners withdraw the motion to quash pending in this action. The clerk shall
12 enter an order of dismissal in due course.

13
14 **SO STIPULATED:**

15 DATED: September 7, 2021.

16 JONES DAY

17 /s/ David S. Torborg

18 David S. Torborg

19 Stephen J. Kenny

20 *Attorneys for Petitioners Forbes Tate*
21 *Partners LLC and Meghan DiMuzio*

22 DATED: September 7, 2021.

23 KANTER LAW GROUP

24 /s/ Brandon Kressin

25 Brandon Kressin

26 *Attorney for Petitioner Coalition for App*
27 *Fairness*
28

1 DATED: September 7, 2021.

2 MCDERMOTT WILL AND EMERY LLP

3 /s/ Nicole L. Castle

4 Nicole Castle

5 John Calandra

6 Michael R. Huttenlocher

7 Paul Michael Thompson

8 *Attorneys for Defendant Apple Inc.*

9
10 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

11 DATED: _____, 2021.

12
13
14
15 _____